

**REMARKS**

Reconsideration of the present application is respectfully requested. Claims 1-22 are currently pending.

**Rejections based on 35 U.S.C. § 102**

Claims 1, 3-4, 7-8, and 10-11 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Saunders, U.S. Patent No. 5,946,499 ("Saunders"). Applicants respectfully traverse this rejection because Saunders does not teach exposing a document of primarily text "as an abstraction" or permitting a handler for an input device "to access the abstraction of the document" as required by independent claims 1 and 7.

Saunders discloses techniques for supporting a plurality of textual services and inputs. A text services manager routes the processing of input events to one or more text service event handlers. An application may communicate with the text services manager so that appropriate text services are activated and prepared for input events. The application does not pass data related to the text of a document to the text service manager. Inputs received from input device handlers are intercepted by the manager, and the manager acts as a filter for events that are passed to the application; the input device handlers are not given access to the text of a document. The manager gives the events to the appropriate services, and the handling of the events are performed using well known handling routines. Hence, the text service manger allows multiple text services to be active on machine and facilitates a determination of which service should handle a given input event.

In contrast, independent claims 1 and 7 each require exposing a document of primarily text "as an abstraction" and permitting a handler for an input device "to access the abstraction of the document." Saunders does not teach exposing a document as an abstraction. Furthermore,

Saunders does not teach input device handlers capable of accessing an abstraction of the document. Accordingly, Applicants submit that independent claims 1 and 7 are in condition for allowance. Applicants submit that dependent claims 3-4, which depend from claim 1, are in condition for allowance for at least the same reasons discussed above with respect to claim 1. Furthermore, Applicants submit that dependent claims 7-8 and 10-11, which depend from claim 7, are in condition for allowance for at least the same reasons discussed above with respect to claim 7.

### **Rejections based on 35 U.S.C. § 103**

Claims 2, 9, and 14-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung et al., U.S. Patent No. 5,511,193 (“Tung”). Claims 5-6, 12-13, and 20-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington et al., U.S. Patent No. 5,524,193 (“Covington”). Claims 18 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung, and further in view of Covington. Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington, and further in view of Tung.

### **Claims 14-17**

Claims 14-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung. The Office Action states, “It would have been obvious and desirable to have used the dynamic text interface taught by Tung to have improved Saunders ...” Applicants respectfully traverse this rejection because neither Saunders nor Tung, alone or in

combination, teach or suggest each and every limitation of the claimed invention as recited in independent claim 14.

As discussed previously, Saunders teaches a text service manger that allows multiple text services to be active on machine and facilitates a determination of which service should handle a given input event. The manager passes the events to the appropriate services, and the handling of the events are performed using well known handling routines. Saunders does not teach exposing a document of primarily text “as an abstraction” as recited in independent claim 14.

Tung also teaches a text services manager. When an application is initiated on a computer system, the text service manager is made aware of the instance of the application. As part of this initiation, the manager determines whether the application uses a floating input window as opposed to an in line input. This determination is made by using a “TSM document” which communicates information between the manager and an application. The information in a TSM document relates to input methods and text services used by a particular instance of the application; the TSM document does not contain an abstraction of a document.

In contrast, claim 14 recites “a dynamic text interface in which an abstraction of a document is such that a position within the document [is] represented as a floating anchor to a node.” Tung does not teach such an interface.

Hence neither Saunders nor Tung, alone or in combination, teach the claimed invention as recited in independent claims 14, and Applicants submit that independent claim 14 is in condition for allowance. Furthermore, Applicants submit that dependent claims 15-17, which depend from claim 14, are in condition for allowance for at least the same reasons discussed above with respect to claim 14.

Claims 20-21

Claims 20-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington. Applicants respectfully traverse this rejection because neither Saunders nor Covington, alone or in combination, teach or suggest each and every limitation of the claimed invention as recited in independent claim 20.

Saunders has been discussed previously and does not teach permitting a handler for an input device “to access an abstraction of a document of mostly text of an application” as required by independent claim 20.

Covington teaches a method for annotating text documents with interactive multimedia events. Such annotation is accomplished via a user interface provided by an application program. The handlers for input devices do not access the document to be annotated, nor do the handlers insert the annotation media. Accordingly, Covington does not teach allowing handlers for input devices to insert “the additional text into the document and [to access] the abstraction of the document” as required by independent claim 20.

Hence neither Saunders nor Covington, alone or in combination, teaches the claimed invention as recited in independent claims 20, and Applicants submit that independent claim 20 is in condition for allowance. Furthermore, Applicants submit that dependent claim 21, which depends from claim 20, is in condition for allowance for at least the same reasons discussed above with respect to claim 20.

Dependent Claims 2 and 9

Claims 2 and 9 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung. Saunders and Tung have been discussed above. Applicants respectfully traverse the rejection because the proposed combination of Saunders and Tung fails to disclose each and every limitation of the claimed invention.

Claim 2 depends from independent claim 1, while claim 9 depends from independent claim 7. As discussed above, claims 1 and 7 are patentable over Saunders. Tung also fails to disclose the invention of claim 1 and claim 7, either individually or in combination with Saunders. Claims 2 includes all of the limitations of claim 1 and is also patentable over Saunders and Tung, taken individually or in combination with one another, for at least the reasons stated above. Claims 9 includes all of the limitations of claim 7 and is also patentable over Saunders and Tung, taken individually or in combination with one another, for at least the reasons stated above.

Dependent Claims 5-6 and 12-13

Claims 5-6 and 12-13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington. Saunders and Covington have been discussed above. Applicants respectfully traverse the rejection because the proposed combination of Saunders and Covington fails to disclose each and every limitation of the claimed invention.

Claims 5 and 6 depend from independent claim 1, while claims 12 and 13 depend from independent claim 7. As discussed above, claims 1 and 7 are patentable over Saunders. Covington also fails to disclose the invention of claim 1 and claim 7, either individually or in combination with Saunders. Claims 5 and 6 include all of the limitations of claim 1 and are also

patentable over Saunders and Covington, taken individually or in combination with one another, for at least the reasons stated above. Claims 12 and 13 include all of the limitations of claim 7 and are also patentable over Saunders and Covington, taken individually or in combination with one another, for at least the reasons stated above.

Dependent Claims 18 and 19

Claims 18 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Tung, and further in view of Covington. Saunders, Tung, and Covington have been discussed above. Applicants respectfully traverse the rejection because the proposed combination of Saunders, Tung, and Covington fails to disclose each and every limitation of the claimed invention.

Claims 18 and 19 depend from independent claim 14. As discussed above, claim 14 is patentable over Saunders and Tung. Covington also fails to disclose the invention of claim 14, either individually or in combination with Saunders and Tung. Claims 18 and 19 include all of the limitations of claim 14 and are also patentable over Saunders, Tung, and Covington, taken individually or in combination with one another, for at least the reasons stated above.

Dependent Claim 22

Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Saunders in view of Covington, and further in view of Tung. Saunders, Covington and Tung have been discussed above. Applicants respectfully traverse the rejection because the proposed combination of Saunders, Covington, and Tung fails to disclose each and every limitation of the claimed invention.

Claim 22 depends from independent claim 20. As discussed above, claim 20 is patentable over Saunders and Covington. Tung also fails to disclose the invention of claim 20, either individually or in combination with Saunders and Covington. Claim 22 includes all of the limitations of claim 20 and is also patentable over Saunders, Covington and Tung, taken individually or in combination with one another, for at least the reasons stated above.

### Conclusion

For the reasons stated above, claims 1-22 are in condition for allowance. Applicants respectfully request withdrawal of the pending rejections and allowance of claims 1-22. If any issues remain which would prevent issuance of this application, the Examiner is urged to contact the undersigned prior to issuing a subsequent action. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112.

Respectfully submitted,



Scott Strohm  
Reg. No. 42,172

SHOOK, HARDY & BACON L.L.P.  
2555 Grand Boulevard  
Kansas City, Missouri 64108  
Phone: 816/474-6550  
Fax: 816-421-5547